

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

SERGEJ LETYAGIN d/b/a
SUNPORNO.COM, IDEAL CONSULT,
LTD., "ADVERT", "CASTA",
"TRIKSTER", "WORKER", "LIKIS",
"TESTER" and DOES 1-50

Defendants

Case No. 12-cv-00923-LRH-GWF

**DECLARATION OF STUART DAVIS IN
SUPPORT OF REPLY TO DEFENDANT
LETYAGIN AND IDEAL CONSULT,
LTD.'S OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO CONDUCT
IMMEDIATE DISCOVERY**

I, STUART DAVIS, being over 18 years of age, having personal knowledge of the facts set forth herein, and being competent to testify to the same if called to do so at trial, state as follows:

1. I am a resident of the city of Prague in the Czech Republic.
2. On Friday, December 9th, 2011, I met with Marc J. Randazza, counsel for Liberty Media Holdings, as well as the executives for that company.
3. At this meeting, we discussed Liberty Media Holdings' ongoing lawsuit against SunPorno.com and the fact that Liberty and its attorney suspected that Sergej Letyagin resided in Prague.

4. Mr. Randazza asked me to assist him with investigation into Mr. Letyagin's true address and to assist him in serving Mr. Letyagin personally with process in the Czech Republic.

5. I made efforts to do so, by both consulting local databases as well as local investigators in Prague. None of them were able to determine Mr. Letyagin's actual address, nor was I able to effect service of process upon Mr. Letyagin in Prague.

I hereby certify that the foregoing is true and correct to the best of my knowledge, sworn under the penalties of perjury under the laws of the United States.

Dated this 7th day of July, 2012 in Prague, Czech Republic.


STUART DAVIS